

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.,

Plaintiff,

PLAINTIFF GMA'S SECOND
REQUEST FOR DOCUMENTS

-against-

Civil Action No.: 07Cv8414 (LAK)

EPARTNERS, INC.

Defendant,

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Plaintiff GMA ACCESSORIES, INC., by and through its attorneys, The Bostany Law Firm, hereby requests Defendants, EPARTNERS, INC. ("ePartners"), to produce copies of the documents set forth below at The Bostany Law Firm, 40 Wall Street, New York, New York 10005 pursuant to Fed.R.Civ.P. 34:

Definition(s):

- A. "You" and "Your": the Defendants responding to this Second Request.
- B. The "Project" is defined as: The process of installing AXAPTA and other hardware/software at GMA pursuant to the contracts between the parties.

1. Any and all emails, memos, documents, records, or writings of any kind reflecting or containing information about the meeting the deadlines as set forth in the contracts.
2. Any and all documents pertaining to the selection of the products and modules.
3. Any and all emails, memos, documents, records, reports, evaluations, or writings of any kind reflecting or containing information concerning performance of

individuals that worked on the project.

4. Any and all emails, memos, documents, records, reports, evaluations, or writings of any kind reflecting or containing information about the monitoring of the progress with respect to project management.
5. Any and all documents pertaining to personnel working on the project.
6. Any and all emails, memos, documents, records, or writings of any kind reflecting or containing information regarding the response to the Capelli problems encountered.
7. Any and all emails, memos, documents, records, or writings of any kind reflecting or containing information about the ePartner sponsors.
8. Any and all documents containing information about the data-migration plan.
9. Any and documents pertaining to:
 - a. The recommendation of AXAPTA
 - b. The installation of AXAPTA
 - c. The implementation of AXAPTA
 - d. The designing AXAPTA
 - e. The configuration of AXAPTA.
10. Any and all documents pertaining to:
 - a. Obtaining the fashion module
 - b. The installation of the fashion module
 - c. The implementation of the fashion module
 - d. The configuration of the fashion module
11. Any and all documents pertaining to:

- a. The recommendation of eBridge
 - b. Obtaining eBridge
 - c. The installation of eBridge
 - d. The implementation of eBridge
 - e. The configuration of eBridge
12. Any and all documents pertaining to:
- a. The recommendation of QLogic
 - b. Obtaining QLogic
 - c. The installation of QLogic
 - d. The implementation of QLogic
 - e. The configuration of QLogic
13. Any and all documents containing information about:
- a. The recommendation of CRM
 - b. Obtaining CRM
 - c. The implementation of CRM
 - d. The installation of CRM
 - e. The configuration of CRM.

Dated: New York, New York
March 20, 2008

By:



Jessica L. Claus
THE BOSTANY LAW FIRM
Attorneys for Plaintiff
40 Wall Street
New York, New York 10005
(212) 530-4400

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.,

Plaintiff,

PLAINTIFF'S SECOND SET OF
INTERROGATORIES

-against-

Civil Action No.: 07Cv8414 (LAK)

EPARTNERS, INC.

Defendant,

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Pursuant to the Federal Rules of Civil Procedure Rule 33, Plaintiff GMA ACCESSORIES, INC., ("GMA") by and through its attorneys, The Bostany Law Firm, hereby requests that Defendant EPARTNERS, INC. ("ePartners") respond fully, separately and under oath to each of the following interrogatories, within thirty (30) days of service hereof.

Definition(s):

A. "Project": The process of installing AXAPTA and other hardware/software at GMA pursuant o the contracts between the parties.

1. Please identify the individual(s) responsible for meeting deadlines on the projects.
2. Please identify the individual(s) responsible for selecting products and modules for the project, indicating with respect to each individual which product and/or module they were responsible for.
3. Please identify the individual(s) responsible for monitoring the progress with project management.
4. Please identify the project manager(s) and with respect to each, the period of time

the individual(s) was a project manager.

5. Please identify all individual(s) that were removed from working on the project and by whom they were replaced.
6. Please identify the individual(s) who responded to the Capelli problems encountered, setting forth the period of time that such individual(s) responded.
7. Please identify all ePartner sponsors and the period of time such individual(s) were designated ePartner sponsors.
8. Please identify all individual(s) involved in the data-migration plan.
9. Please identify the individual(s) responsible for:
 - a. recommending AXAPTA
 - b. installing AXAPTA
 - c. implementing AXAPTA
 - d. designing AXAPTA
 - e. configuring AXAPTA.
10. Please identify the individual(s) responsible for:
 - a. recommending the fashion module
 - b. obtaining the fashion module
 - c. installing the fashion module
 - d. implementing the fashion module
 - e. configuring the fashion module
11. Please identify the individual(s) responsible for:
 - a. recommending eBridge
 - b. obtaining eBridge

- c. installing eBridge
 - d. implementing eBridge
 - e. configuring eBridge
12. Please identify the individual(s) responsible for:
- a. recommending QLogic
 - b. obtaining QLogic
 - c. installing QLogic
 - d. implementing QLogic
 - e. configuring QLogic
13. Please identify the individual(s) responsible for:
- a. recommending CRM
 - b. obtaining CRM
 - c. implementing CRM
 - d. installing CRM
 - e. configuring CRM

Dated: New York, New York
March 20, 2008

By:



Jessica L. Claus
THE BOSTANY LAW FIRM
Attorneys for Plaintiff
40 Wall Street
New York, New York 10005
(212) 530-4400

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.,

Plaintiff,

PROOF OF SERVICE

Civil Action No.: 07Cv8414 (LAK)

- against -

EPARTNERS, INC.

Defendant.

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I, Charen Kim, work at the Bostany Law Firm, hereby certify that a copy of GMA's Accessories, Inc.'s Second Requests for the Production of Documents and Interrogatories were delivered by mail on March 20, 2008, to the following:

Peter Brown, Esq.
Thelen Reid Brown Raysman & Steiner LLP
875 3rd Avenue
New York, New York 10022

Dated: New York, New York
March 20, 2008

By:


Charen Kim